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SEP 22 2022

U.S. BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

6 *Pro Se Fire Victim Claimant and Party to related proceedings before the California Public Utilities*
7 *Commission and the California Office of Energy Infrastructure Safety*

10 **UNITED STATES BANKRUPTCY COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**
12 **SAN FRANCISCO DIVISION**

13 In re:

14 PG&E CORPORATION,

15 -and-

16 PACIFIC GAS AND ELECTRIC
17 COMPANY,

18 Debtors.

- 19 ☐ Affects PG&E Corporation
20 ☐ Affects Pacific Gas and Electric Company
21 ☒ Affects both Debtors

22 * *All papers shall be filed in the lead case,*
23 *No. 19-30088 (DM)*
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Bankr. Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administrated)

**DECLARATION OF WILLIAM B.
ABRAMS IN SUPPORT OF MOTION
OF WILLIAM B. ABRAMS
PURSUANT TO FEDERAL RULE OF
BANKRUPTCY PROCEDURE 2004
FOR ENTRY OF AN ORDER
AUTHORIZING DISCOVERY AND
HEARINGS REGARDING DEBTORS
ACTS, CONDUCT AND
AGREEMENTS THAT MAY
OBSTRUCT OR LIMIT THE JUST
AND FAIR MANAGEMENT OF THE
FIRE VICTIM TRUST**

1 I, William B. Abrams, pursuant to section 1746 of title 28 of the United States Code,
2 hereby declare under penalty of perjury that the following is true and correct to the best of my
3 knowledge, information, and belief:

4 1. I am a claimant and a PG&E Fire Survivor who has engaged in this proceeding as a
5 Pro Se party to promote and collaborate with core parties in good-faith towards a plan, PG&E Fire
6 Victim Trust Agreement and to ensure prudent Trust oversight that provides just settlements for all
7 claimants as well as adequate restructuring for Pacific Gas and Electric Corporation so our
8 communities are safe from the growing risks of utility-caused wildfires.

9 2. I submit this declaration in support of this "*MOTION OF WILLIAM B. ABRAMS
10 PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 2004 FOR ENTRY OF AN
11 ORDER AUTHORIZING DISCOVERY AND HEARINGS REGARDING DEBTORS ACTS,
12 CONDUCT AND AGREEMENTS THAT MAY OBSTRUCT OR LIMIT THE JUST AND FAIR
13 MANAGEMENT OF THE FIRE VICTIM TRUST*" (the "**Motion**") filed concurrently herewith.

14 3. After the PG&E Fires of 2017, I felt compelled to engage as a party to certain
15 proceedings at the California Public Utilities Commission to work collaboratively towards solutions
16 that address wildfire mitigation and other utility/energy issues. Some of these proceedings are related
17 to this case. All of my filed comments are in the public record through the Commission's website.
18 As an intervenor in these proceedings, I have received some compensation from Investor Owned
19 Utilities including Pacific Gas and Electric Company. I have no financial interests in this case that
20 are adverse to those of victims. I have no litigation financing or lines of credit tied to PG&E
21 shareholders, bondholders or any other party in this case. I have not and do not intend to get any
22 compensation for my involvement in this case other than through my claim and those claims of my
23 family through the PG&E Fire Victim Trust. I have not engaged in activities to undermine the value
24 of the Fire Victim Trust or to slow the Trust administration process.

25 4. The "Exhibit C" attached to the Motion is a true and correct copy of the email
26 correspondence posted to Facebook by Lora Fay Fournier and dated September 13, 2022. I
27 appreciate Ms. Fournier making this email exchange public and felt compelled to file this given the
28 concerns and characterizations of Ms. Riddle expressed within this letter regarding the acts and
conduct of the Debtors. I was concerned that as a Trust Oversight Committee Member, Ms. Riddle
may be unable to raise these concerns directly with the Court due to undisclosed terms which are the
focus of this Motion.

29 5. The "Exhibit D" and "Exhibit F" attached to the Motion are true and correct copies of
30 the "*WILLIAM B. ABRAMS OPENING BRIEF ON APPLICATION OF PACIFIC GAS AND
31 ELECTRIC COMPANY FOR RECOVERY OF RECORDED EXPENDITURES RELATED TO
32 WILDFIRE MITIGATION, CATASTROPHIC EVENTS AND OTHER RECORDED COSTS*" filed on
33 September 16, 2022 and related public comments by victims and others and posted to the California
34 Public Utilities Commission website. I provided these documents for the Court to consider and to
35 contrast these public actions on behalf of victims with the lack of public action on behalf of the
36 Trustee and other core parties within this case.

1 6. The "Exhibit E" attached to the Motion is a true and correct copy of email
2 correspondence between myself, the Former Trustee, The Present Trustee, Trustee Counsel and other
3 core parties to this case. I felt compelled to provide these email exchanges to demonstrate that parties
4 were aware of ways to publicly engage on behalf of victims but did not. The degree to which
undisclosed provisions prevented or limited their acts and conduct is the focus of this Motion.

5 7. I declare under penalty of perjury that, to the best of my knowledge and after
6 reasonable inquiry, the foregoing is true and correct and that this declaration was executed at Santa
7 Rosa, California on September 22, 2022.

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11 William B. Abrams
12 Pro Se Claimant
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